

UNITES STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BETHANIA RODRIGUEZ, Individually and on Behalf :
of All Other Persons Similarly Situated, :

Plaintiff, :

-against- :

NEW YORK FOUNDATION FOR SENIOR :
CITIZENS HOME ATTENDANT SERVICES, INC., :
LINDA R. HOFFMAN, and JOHN DOES #1-10, :

Defendants. :
----- X

15-CV-9817 (VEC)(HBP)

**NOTICE OF MOTION
TO COMPEL ARBITRATION
AND DISMISS THE ACTION**

TO: William Coudert Rand, Esq.
Law Office of William Coudert Rand
501 Fifth Avenue, 15th Floor
New York, New York 10017
Attorney for Plaintiff

TO THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Motion to Compel Arbitration and Dismiss the Action and Declaration of Kenneth W. DiGia, with accompanying exhibits, Defendants, New York Foundation for Senior Citizens Home Attendant Services, Inc. and Linda R. Hoffman, by and through their attorneys Epstein Becker & Green, P.C., will move this Court before the Hon. Valerie E. Caproni at the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, New York, New York 10017, at a date and time to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b) (6) and the Federal Arbitration Act, 9 U.S.C. § 4, compelling Plaintiff to proceed with mediation/arbitration of her claims on an individual basis,

dismissing the action in its entirety, and for such other relief as the Court may deem just and proper.

Dated: New York, New York
March 18, 2016

EPSTEIN BECKER & GREEN, P.C.

By: 

Kenneth W. DiGia

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